



United States Attorney
Southern District of New York

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USDC SDNY

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February 26, 2020

VIA ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: *United States v. Todd Kozel*
19 Cr. 460 (KMW)

MEMO ENDORSED

Dear Judge Wood:

I write respectfully to request an extension of the Government's response date to the defendant's pending motion for a Bill of Particulars and Motion to Dismiss (the "Motions"). Currently, the Government's Motion responses are due March 5, 2020, and defendant's replies are due March 19, 2020. (Dkt. No. 42).

As discussed in our previous request for an extension, the parties have entered into discussions that may result in the potential resolution of the charges in this case. Those discussions are ongoing, and include a meeting between counsel in New York the week of March 2, 2020. Accordingly, the Government respectfully requests that the Government's Motions response date be adjourned to April 3, 2020, and the defendant's reply date to April 17, 2020. Granted.
KMW

The Government further requests that the Court exclude time under the Speedy Trial Act through the briefing dates set by the Court. The undersigned has conferred with counsel for the defendant, and he consents to this request, including exclusion of time while the Motions are pending.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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3-2-20
SO ORDERED: N.Y., N.Y.

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.